Buddy Garcia, Chairman Larry R. Soward, Commissioner Bryan W. Shaw, Ph.D., Commissioner Glenn Shankle. Executive Director



TEXAS COMMISSION ON ENVIRONME

Protecting Texas by Reducing and Preventing Pollution

February 29, 2008

Mr. Gary Miller, Remedial Project Manager U.S. EPA Region 6 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Phase 3 Wetland Sediment investigation Data and Proposed Phase 4 Wetland Sediment Re: Investigation Activities, dated February 12, 2008

Gulfco Marine Maintenance Federal Superfund Site, Freeport, Brazoria County, Texas

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ) has completed review of the above referenced document. The review of this document was completed by the TCEQ Environmental Cleanup Section II, Technical Support Section (Larry Champagne) and the Natural Resource Trustees (National Oceanic and Atmospheric Agency, U.S. Fish and Wildlife Service and Texas General Land Office). Based on review of the document, the TCEQ and Trustees have the following comments as presented below:

- Previous comments on the Phase 1-2 sediment investigation regarding the use of the most recent update of TCEQ's (2006) ecological risk assessment guidance to obtain the most appropriate preliminary screening values apply here and in the evaluation of the Phase 4 samples.
- Contrary to the text, the locations for proposed samples 4WSED2 and 4WSED3 2. do not appear on Figure 1.

References:

TCEO, 2006. Update to Guidance for Conducting Ecological Risk Assessments at Remediation Sites in Texas RG-263 (Revised). January. http://www.tceq.state.tx.us/remediation/eco/eco.html

If you have any questions please contact me at (512) 239-6368.

Sincerely,

Ludmila Voskov, P.G., Project Manager Team 3, Environmental Cleanup Section II

Remediation Division

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Texas Commission on Environmental Quality

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